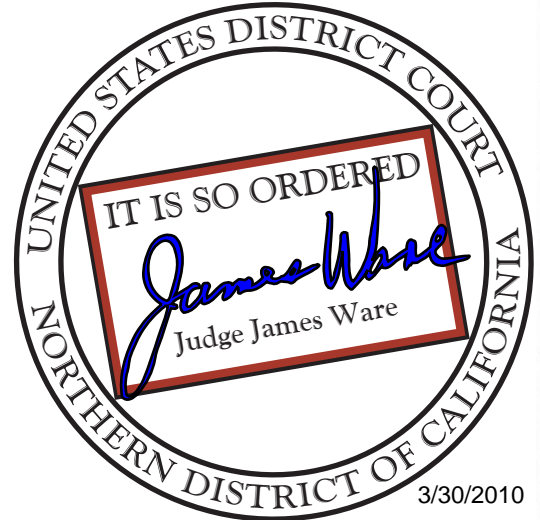


DONALD F. ZIMMER, JR. (State Bar No. 112279)
KING & SPALDING LLP
101 Second Street
Suite 2300
San Francisco, CA 94105
Telephone: (415) 318-1200
Facsimile: (415) 318-1300
Email: fzimmer@kslaw.com

Attorney for Defendant
GLAXOSMITHKLINE LLC (formerly known as
SMITHKLINE BEECHAM CORPORATION
d/b/a GLAXOSMITHKLINE)



3/30/2010

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

COUNTY OF SANTA CLARA,

Individually, and on behalf of the People of
the State of California,

Plaintiff,

-vs.-

SMITHKLINE BEECHAM CORPORATION
d/b/a GLAXOSMITHKLINE, A Pennsylvania
Corporation; and DOES 1 to 100, Inclusive,

Defendants.

Case No. 5:-10-cv-000832-JW

**JOINT STIPULATION FOR
SUBSTITUTION AND DISMISSAL OF
DEFENDANTS**

Judge: Honorable James Ware

It is hereby agreed between counsel for the County of Santa Clara and counsel for
GlaxoSmithKline LLC that in light of defendant's conversion into a limited liability company
and name change, defendant GlaxoSmithKline LLC will be substituted for SmithKline Beecham
Corporation d/b/a GlaxoSmithKline. Further, counsel agrees to dismiss defendant
GlaxoSmithKline, PLC pursuant to Pretrial Order No. 54.

///

///

**OFFICE OF THE COUNTY COUNSEL
COUNTY OF SANTA CLARA**

KING & SPALDING LLP

Miguel Marquez
Tamara Lange
Katherine Desormeau
70 West Hedding Street
East Wing, 9th Floor
San Jose, CA 95110
(408) 299-5900

/s/ Donald F. Zimmer, Jr.
Donald F. Zimmer, Jr.
KING & SPALDING LLP
101 Second Street, Suite 2300
San Francisco, CA 94105
(415) 318-1220

G. Erick Rosemond
R. Keith Weber, Jr.
2 Houston Center
WOODFILL & PRESSLER LLP
909 Fannin, Suite 1470
Houston, TX 77010
(713) 751-3080

Nina M. Gussack
Anthony Vale
Yvonne M. McKenzie
PEPPER HAMILTON LLP
3000 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103
(215) 981-4000

and

Paul R. Kiesel
Steven D. Archer
KIESEL BOUCHER LARSON LLP
8648 Wilshire Boulevard
Beverly Hills, CA 90211-2910
(310) 854-4444

Attorneys for Defendant
GLAXOSMITHKLINE LLC (formerly known
as SMITHKLINE BEECHAM
CORPORATION d/b/a
GLAXOSMITHKLINE)

and

John Boundas
Harry G. Potter III
**WILLIAMS KHERKHER HART
BOUNDAS LLP**
8441 Gulf Freeway, Suite 600
Houston, TX 77017-5051
(713) 230-2200

Attorneys for Plaintiff

I attest that G. Erick Rosemond concurs in the filing of this stipulation.

/s/ Donald F. Zimmer, Jr.

DONALD F. ZIMMER, JR.

1
2 **OFFICE OF THE COUNTY COUNSEL**
3 **COUNTY OF SANTA CLARA**

KING & SPALDING LLP

4 Miguel Marquez
5 Tamara Lange
6 Katherine Desormeau
7 70 West Hedding Street
8 East Wing, 9th Floor
9 San Jose, CA 95110
10 (408) 299-5900

Donald F. Zimmer, Jr.
KING & SPALDING LLP
101 Second Street, Suite 2300
San Francisco, CA 94105
(415) 318-1220

8 G. Erick Rosemond
9 R. Keith Weber, Jr.
10 2 Houston Center
11 **WOODFILL & PRESSLER LLP**
12 909 Fannin, Suite 1470
13 Houston, TX 77010
14 (713) 751-3080

Nina M. Gussack
Anthony Vale
Yvonne M. McKenzie
PEPPER HAMILTON LLP
3000 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103
(215) 981-4000

and

13 Paul R. Kiesel
14 Steven D. Archer
15 **KIESEL BOUCHER LARSON LLP**
16 8648 Wilshire Boulevard
17 Beverly Hills, CA 90211-2910
18 (310) 854-4444

Attorneys for Defendant
GLAXOSMITHKLINE LLC (formerly known
as SMITHKLINE BEECHAM
CORPORATION d/b/a
GLAXOSMITHKLINE)

and

18 John Boundas
19 Harry G. Potter III
20 **WILLIAMS KHERKHER HART**
21 **BOUNDAS LLP**
22 8441 Gulf Freeway, Suite 600
23 Houston, TX 77017-5051
24 (713) 230-2200

Attorneys for Plaintiff

1 *County of Santa Clara v. SmithKline Beecham Corporation dba GlaxoSmithKline*
2 *USDC, Northern District of California, San Jose, Case No. 5:10-cv-00832-JW*

3
4 **PROOF OF SERVICE**

5 I am a resident of the state of California, I am over the age of 18 years, and I am not a
6 party to this lawsuit. My business address is King & Spalding LLP, 101 Second Street, Suite
2300, San Francisco, California 94105. On the date set forth below, I served the following
document(s):

7 **JOINT STIPULATION FOR SUBSTITUTION AND DISMISSAL OF DEFENDANTS**

8 on the interested party(ies) in this action in the following manner:

9
10 ☒ BY U.S. MAIL: ☒ I enclosed the documents in a sealed envelope or package
11 addressed to the person(s) set forth below, and placed the envelope for collection and
12 mailing following our ordinary business practices, which are that on the same day
correspondence is placed for collection and mailing, it is deposited in the ordinary
13 course of business with the United States Postal Service in San Francisco, California,
14 in a sealed envelope with postage fully prepaid. OR
☐ I enclosed the documents in a sealed envelope or package addressed to the
person(s) set forth below, and deposited the sealed envelope with the United States
Postal Service, with the postage fully prepaid.

15 G. Erik Rosemond
16 Woodfill & Pressler LLP
17 2 Houston Center
Suite 1470
Houston, TX 77017

John T. Boundas
Williams Kherkher Hart Boundas LLP
8441 Gulf Freeway
Suite 600
Houston, TX 77017

18
19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.

21
22 Executed on March 24, 2010, at San Francisco, California.

23
24
25 
26 Beth M. Coffey
27
28